



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

MAR 23 1993

Reply To
Attn Of: HW-113

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Boeing Aerospace Corporation
Safety Health & Environmental
Affairs, M/S 6U-02
ATTN: R.R. Saulsman
P.O. Box 3707
Seattle, WA 98124-2207

Re: Request for Information Pursuant to Section 104 of CERCLA
[and Section 3007 of RCRA,] for the Moses Lake Wellfield
Contamination Superfund Site in Moses Lake, Washington,
hereinafter sometimes referred to as "the Moses Lake
Wellfield Superfund Site" or "the Site"

Dear Mr. Saulsman:

The United States Environmental Protection Agency (EPA) is currently investigating the source, extent, and nature of the release or threatened release of hazardous substances, pollutants, or contaminants, or hazardous wastes on or about the Moses Lake Wellfield Superfund Site in Moses Lake, Washington. The Site is now listed on the National Priorities List (NPL) pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986 (to be herein referenced as CERCLA).

By this letter, EPA requests information from Boeing Aerospace Corporation pursuant to the authority of Section 104(e) of CERCLA, 42 U.S.C. §9604(e) and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927.

Site Background

Groundwater contamination at the Moses Lake Superfund Site was initially identified in early 1988 by the Washington Department of Health ("WDOH") as part of routine sampling of municipal drinking water wells. Two of these wells contained

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trichloroethylene ("TCE"), a volatile organic chemical which is known to cause adverse health effects in humans. Additional sampling conducted later in 1988 indicated that some wells had contamination levels significantly above the EPA drinking water standards. An independent study by Washington Department of Ecology ("Ecology") confirmed these tests.

EPA subsequently began to investigate possible sources of this groundwater contamination. Several locations were identified as potential contamination sources. As a result of these investigations, EPA proposed the Moses Lake Wellfield for the National Priorities List ("NPL") in July 1991, and the site was listed in October 1992. The NPL is the list of hazardous waste sites throughout the United States that require investigation and cleanup to protect human health and/or the environment.

Based on preliminary sampling at the Site, the size and extent of the contaminated groundwater, called the groundwater plume, is about 1 mile wide, 3 miles long, and 100-300 feet deep extending south from the former Larson Air Force Base. Investigations will be conducted to define the contaminated plume and identify sources of this contamination.

REQUEST FOR INFORMATION

1. EPA has the authority under Section 104 of CERCLA, 42 U.S.C. §9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927 to require any person who has or may have information relevant to the following to furnish such information:
 - a. The identification, nature, and quantity of materials that have been or are generated, treated, stored, or disposed of at the site.
 - b. The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from the site.
 - c. Information relating to the ability of a person to pay for or perform a cleanup.
2. The information required herein must be provided even though you may contend that it includes possible confidential information or trade secrets. You are entitled to assert a claim of confidentiality for any information submitted in response to this request. EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations, 41 Federal Register 36902-36924 (September 1,

1976), as amended by 43 FR 40000 (September 8, 1978), 44 FR 17673 (March 23, 1979), 48 FR 11270 (March 17, 1983), and 50 FR 61661 (December 18, 1985). For any portion of the information submitted that is entitled to confidential treatment, please assert a confidentiality claim in accordance with Section 104(e)(7) of CERCLA and 40 C.F.R. §2.200. The information will be disclosed only to the extent, and by means of, the procedures specified in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

3. Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to this Information Request within thirty calendar days of receipt of this letter may subject you to an enforcement action under Section 104 of CERCLA, 42 U.S.C. §9604 and Section 3008 of RCRA, 42 U.S.C. §6928. Each of those statutes permits EPA to seek the imposition of penalties of up to \$25,000 for each day of continued noncompliance. Provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001 or under Section 3008(d) of RCRA, 42 U.S.C. §6928(d). Under Section 103 of CERCLA, it is unlawful for any person knowingly to destroy, mutilate, erase, or dispose of, conceal, or otherwise render unavailable or unreadable, or falsify any of the records required to be maintained pursuant to Section 103(d)(1), 42 U.S.C. §9603(d)(1).
4. This request for Information is not subject to Section 3512 of the Paperwork Reduction Act of 1980, as amended, 44 U.S.C. Chapter 35, or regulations implementing Section 3512 of the Paperwork Reduction Act 5 C.F.R. Section 1320.5 because it has a currently valid OMB control number or is being submitted to nine or fewer persons or EPA has opened a case file or its equivalent with respect to the party requested to provide specific information who is separate and identifiable from otherwise similar parties.

Questions

1. Identify the person(s) answering these Questions on behalf of Boeing Aerospace Corporation, herein sometimes referred to as "Boeing."
2. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.
3. For each and every Question contained herein, identify all documents consulted, examined, or referred to in

the preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.

4. List the EPA RCRA Identification Numbers of Boeing, if any, for its facilities on or near the Site, and identify the corresponding units, facilities, or vessels assigned these numbers.
5. Provide copies of property leases or deeds relating to Boeing's location on or near the Site. Include a legal description of property and the dates that property was owned, leased, or operated.
6. Describe any warning signs, barrels, pits, canisters, stained soil, burned soil, distressed vegetation, polluted ponds, or evidence of excavation on the property when Boeing moved in.
7. Identify all persons, including, but not limited to, Boeing's employees, who have or may have knowledge, information, or documents about the generation, use, purchase, treatment, storage, disposal, or other handling of solvents at or transportation of solvents to the Site.
8. Describe all leaks, spills, or releases of any kind into the environment of any hazardous material (especially fuel and/or solvents) that have occurred at or from the Site, including, but not limited to:
 - a. When such releases occurred.
 - b. How the releases occurred.
 - c. What hazardous substances were released.
 - d. What amount of each such hazardous material was so released.
 - e. Where such releases occurred.
 - f. Any and all investigations of the circumstances, nature, extent, or location of each such release, including the results of any soil, water (ground and surface), or air testing that was undertaken.
9. Describe any and all past and present use of TCE by Boeing at or near the Site. Specifically address where the TCE was stored, how it was used, what quantities

were used and what employees used it. Describe how waste TCE (including contaminated sludge, filter cake or rags) was disposed of, where it was disposed of, and what quantities were disposed of. Identify all persons who supplied TCE to Boeing. Provide copies of all documents that mention TCE.

10. Identify all persons involved with the degreaser located in or near 8-01 Building (three place hangar) between approximately 1954 and 1962.
11. Provide all documents pertaining to the operation and maintenance of the above-mentioned degreaser for the period between approximately 1954 and 1962.
12. Identify all disposal contractors who picked up hazardous waste from the 8-14 building throughout Boeing's occupation of property at or near the Site.
13. Identify with specificity where Boeing stored hazardous materials and hazardous waste for its Port of Moses Lake facility prior to 1987.
14. Identify what locations other than the 8-14 building Boeing has used, since 1987, to store hazardous materials and hazardous waste used and/or generated at its Port of Moses Lake facility.
15. Information provided by Boeing to EPA on August 25, 1989, pursuant to EPA's Request for Information dated June 14, 1989, states that "No records prior to 1980 were located" regarding past and present waste types generated by all site operations. Identify sources consulted by Boeing in providing records and/or documents prior to 1980 for that 1989 response. Specify what sections of Boeing Archives were searched. If subsequent search has located documents that are responsive to that Information Request, provide them. If documents pertaining to waste types were destroyed, provide documentation of destruction. (A copy of Boeing's 8-25-89 response is attached.)
16. Identify persons interviewed or consulted in the preparation of Boeing's 8-25-89 response regarding waste materials, chemical constituents of each waste, and types of waste storage and disposal.
17. In the 1989 response Boeing states that: "Prior to 1980, some wastes were transported to Boeing in Seattle...". Provide information on how the remainder of the waste was disposed of.

18. Provide all information and documents relating to use of the oil pit (located just west of the 8-15 building) between 1954 and 1962.
19. Explain how the two barrels of trichloroethylene (TCE) waste, noted on the Hazardous Waste Manifest dated 9/2/82 (cited in your 8-25-89 response, which is included with this Request for Information), were generated prior to their being removed from the Site in 1982.
20. Describe all activities conducted in paint hangar(s) at the Site, including but not limited to: stripping of paint and methods of preparing surfaces to be painted. Identify solvents used. Provide documents that address the drainage around paint hangars.
21. Describe aircraft washing procedures, and engine and parts washing procedures at the Site. Identify solvents used.
22. Describe degreasing procedures. Identify solvents used.
23. Provide engine maintenance manuals, and painting and stripping manuals for all types of aircraft stored, repaired, tested, and/or serviced at Site prior to 1989.
24. Provide information and all documents addressing holding ponds where solvents have been disposed.
25. Provide any and all documents containing information relating to a fuel spill on or about October 9, 1986 of approximately 2000 gallons of fuel spilled in the vicinity of the 8-01 building. Identify persons involved with the spill, reporting, and clean-up.
26. Provide all information and documents pertaining to any fuel spill that occurred at a fueling apron at or near Boeing facilities in the 1960s during which the fuel drained into the U-shaped containment trench.
27. Provide all information and documents referring to any and all spills, leaks, or accidental discharges from any of the storage tanks used by Boeing.
28. Provide any and all information, knowledge, or records pertaining to use of TCE by any other business or individuals at or near the Site.

29. Identify all persons, including, but not limited to, Boeing's employees, who have or may have knowledge or information about solvents used by Boeing at or near the Site.
30. For each and every Question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then identify the persons from whom such information or documents may be accessible.

Instructions

1. Provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the number of the Question to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.

Definitions

The following definitions shall apply to the following words as they appear in this Request for Information:

1. The term "Site" as used in this letter and request for information refers to the term "facility" as it is broadly defined in CERCLA. A facility includes "any site or area where a hazardous substance has been deposited, stored, disposed of, or placed or otherwise come to be located . . . " (42 U.S.C. §9601(9)). The Moses Lake Wellfield Superfund Site is a facility for purposes of CERCLA.

2. The term "Person" has the same definition as in Section 101(21) of CERCLA: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.
3. The term "Hazardous Substance" has the same definition as that contained in Section 101(14) of CERCLA and includes any mixtures of such hazardous substances with any other substances, including petroleum products.
4. The terms "Pollutant" or "Contaminant" have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.
5. The term "Hazardous Waste" has the same definition as that contained in Section 1004(5) of RCRA.
6. The term "Materials" means all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site, including but not limited to all hazardous substances, pollutants and contaminants, and hazardous wastes as defined above.
7. The term "Hazardous Materials" means all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above.
8. The term "Identify", with respect to a natural person, means to set forth the person's name, present or last known business address and business telephone number, present or last known home address, and home telephone number, and present or last known job title, position, or business.
9. The term "Identify", with respect to a corporation partnership, business trust, or other association or business entity (including a sole proprietorship), means to set forth its full name, address, legal form (e.g., corporation, partnership, etc.) organization, if any, and a brief description of its business.
10. The term "Identify", with respect to a document, means to provide its customary business description, its date, its number, if any (Invoice or purchase order number), the identity of the author, addressor, addressee, and/or recipient, and the substance or the subject matter.

11. The term "Release" has the same definition as that contained in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
12. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes any writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, interoffice or intra-office communications, photostat or other copy of any documents, any film record, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such, disc, or disc pack, tape or other type of memory; and:
 - a. every copy of each document which is not an exact duplicate of a document which is produced,
 - b. every copy which has any writing, figure, notation, annotation, or the like on it,
 - c. drafts,
 - d. attachments to or enclosures with any document, and
 - e. every document referred to in any other document.
13. The terms "TCE," "Trichloroethene," and "Trichloroethylene" shall be defined as (but not limited to) common and brand names - acetylene trichloride, ethinyl trichloride, trike, Algylen, Aramenth, Blacosolv, Chlorylen, Circosolv, Dow-Tri, Fleck-Flip, Gamalgene, Landin, Lethurin, Narcogen, Narcosoid, Nialk, Perm-A-Chlor, Petzinol, Philex, Threthylen, Trethylen, TRI, Triad, Trial, Triasol, Trichloran, Trichloren, Triclene, Tri-Clene, Trielene, Trielin, Trilene, Triline, Trimar, Trisan, Vestrol, Vitron, Westrol, and products containing TCE (including but not limited to): Adhes-Off, Balkamp Klean and Prime, Bowes Buffing Solution, Carboff, Carbona Cleaning Fluid, Carbona #10, Crater 2X Fluid, Crater 5X Fluid, Detrex-Eaton Dux, Perm-A-Chlor, and TFE Dri-Glide.
14. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40

CFR Part 300, or 40 CFR Parts 260-280, in which case the statutory or regulatory definition shall apply.

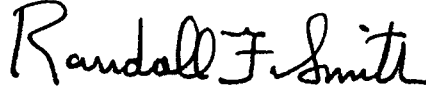
Due to the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the specified time. The information requested must be provided within thirty (30) days of receipt of this letter to:

U.S. Environmental Protection Agency
Eric Winiecki, Site Manager
Superfund Remedial Branch, HW-113
1200 Sixth Avenue
Seattle, Washington 98101

Legal questions should be directed to Joan Shirley, Assistant Regional Counsel, at (206) 553-0978. Technical questions should be directed to Eric Winiecki, Site Manager, at (206) 553-6904.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Randall F. Smith". The signature is fluid and cursive, with the first name "Randall" being the most prominent part.

Randall F. Smith, Director
Hazardous Waste Division

cc: Marian Abbett, Washington Department of Ecology

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Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address 2. ☐ Restricted Delivery
 ↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to
Boeing Aerospace Corporation
Safety Health & Env. Affairs,
M/S 6U-02
 ATTN: R.R. Saulsman
 P.O. Box 3707
 Seattle, WA 98124-2207

4. Article Number
783 581 194

Type of Service
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED**

5. Signature — Addressee
X

6. Signature — Agent
X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

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PS Form 3800, June 1990

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TOTAL Postage & Fees	\$
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Boeing Aerospace Corporation
 ATTN: R.R. Saulsman/M/S 6U-02
 P.O. Box 3707
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- Endorse article "Return Receipt Requested" adjacent to number



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US Environmental Protection Agency

Region 10

1200 Sixth Ave

M/S HW-113

Seattle, WA 98101

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- 2 If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article
- 3 If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to the back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number
- 4 If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article
- 5 Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811
- 6 Save this receipt and present it if you make inquiry

☆ U S G P O 1990-270-153

PS Fo. m 3800, June 1990 (Reverse)